

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Dara L. Silveira (#274923)
(dsilveira@kbbkllp.com)
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel: (415) 496-6723
Fax: (650) 636-9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY
DEFAULT ON MOTION FOR ENTRY OF
AN ORDER FURTHER EXTENDING
DEADLINE FOR THE REORGANIZED
DEBTORS TO OBJECT TO CLAIMS AND
FOR RELATED RELIEF**

[Re: Docket No. 14135]

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
3 “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized**
4 **Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request,
5 pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court
6 for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second*
7 *Amended Order Implementing Certain Notice and Case Management Procedures* entered on May
8 14, 2019 [Docket No. 1996] (“**Case Management Order**”), that the Court enter an order by default
9 on the *Motion for Entry of an Order Further Extending Deadline for the Reorganized Debtors to*
10 *Object to Claims and for Related Relief* filed by the Reorganized Debtors on November 14, 2023
11 [Docket No. 14135] (the “**Motion**”)¹.

12 **RELIEF REQUESTED IN THE APPLICATION**

13 The Motion seeks entry of an order (i) further extending the deadline established under the
14 Plan for the Reorganized Debtors to object to Claims by an additional one hundred eighty (180) days,
15 through and including June 17, 2024, without prejudice to the Reorganized Debtors’ right to seek
16 additional extensions thereof; and (ii) granting related relief. Such a proposed order (the “**Proposed**
17 **Order**”) was attached as Exhibit A to the Motion.

18 **NOTICE AND SERVICE**

19 A notice of hearing on the Motion was filed on November 14, 2023 [Docket No. 14137] (the
20 “**Notice of Hearing**”). The Motion, the Notice of Hearing, and the supporting declaration of Robb
21 McWilliams [Docket No. 14136] were served as described in the Certificate of Service of Victor
22 Wong, filed on November 21, 2023 [Docket No. 14145]. The deadline to file responses or oppositions
23 to the Motion has passed, and no responses or oppositions have been filed with the Court or received
24 by counsel for the Reorganized Debtors.

25
26
27
28 ¹ Capitalized terms not herein defined shall have the meanings ascribed to them in the Motion.

1 **DECLARATION OF NO OPPOSITION RECEIVED**

2 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

3 1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the
4 Reorganized Debtors.

5 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that
6 no response or opposition has been filed with respect to the Motion.

7 3. This declaration was executed in San Francisco, California.

8 WHEREFORE, the Reorganized Debtors hereby request entry of the Proposed Order, granting
9 the Motion as set forth therein.

10 Dated: November 30, 2023

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

11 /s/ *Dara L. Silveira*
12 Dara L. Silveira

13 *Attorneys for Debtors and Reorganized Debtors*